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1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DR. OLIVER JOVANOVIC,

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PLAINTIFF,

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5 -against- Case No.:
04 CV 8437 (PAC)

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7 THE CITY OF NEW YORK, DETECTIVE MILTON BONILLA,
Shield No. 61, individually and in his official
8 capacity, New York County Assistant District Attorney
LINDA FAIRSTEIN, individually and in her official
9 capacity,

10 DEFENDANTS.

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11 DATE: July 10, 2009
TIME: 10:23 a.m.

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14 EXAMINATION BEFORE TRIAL of the Plaintiff,
15 taken by the Defendant, pursuant to a Notice and to the
16 Federal Rules of Civil Procedure, held at the offices of
17 Michael A. Cardozo, Esq., Corporation Counsel, 100 Church
18 Street, New York, New York 10007, before John A. Lugo, a
19 Notary Public of the State of New York.

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1 information. Do you see that?

2 A. Yes, this is similar to this other list.

3 Q. This other list referring to Exhibit A, right?

4 A. Yes.

5 Q. So if we look at the second name on Exhibit B,

6 hellcat902. Do you see that?

7 A. Yes.

8 Q. Next to hellcat902 it says, "Editor, sub, never

9 spoke to." Do you see that?

10 A. Uh-huh.

11 Q. Yes?

12 A. Yes.

13 Q. And what does the word "sub" refer to?

14 A. I think that means that they were interested in

15 submission, you know, as in dominance and submission or

16 bondage and some aspect of that.

17 Q. And why was that significant to you?

18 MR. NORINSBERG: Objection.

19 A. This would have been just something that had come

20 up in our online conversations, and, I guess, it was

21 specifying what their interest was sexually. I mean, it's

22 part of a large number of interests here.

23 Q. Take a look at line 17 on Exhibit B,

24 jadeprincess. Do you see that?

25 A. Uh-huh.

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1 Q. You have to answer yes or no.

2 A. Yes. Sorry.

3 Q. Okay. And also next to jadeprincess is the word

4 "sub." Do you see that?

5 A. Yes.

6 Q. So jadeprincess also would have been interested

7 in submission of some sort, right?

8 MR. NORINSBERG: Objection.

9 A. Like I said, I think this was more -- I wouldn't
10 say specifically submission. I think this was just a
11 shorthand term I used saying they might be interested in
12 some aspect of bondage or dominance. And that they would
13 be on the, I guess, the more -- more on the submissive end
14 of things than on the dominant end of things. I'm not sure
15 exactly what their interest would be looking at this.

16 Q. And why would that information be important to
17 you?

18 MR. NORINSBERG: Objection.

19 A. Well, this would be -- these were people that I
20 would, you know, talk to. And if they brought this up or
21 if this came up in our conversations in some way and, you
22 know, they said this was something they were interested in,
23 I'd make a note of it just to be aware of it. I mean, some
24 of these were people that I flirted with, so it's part of
25 what you try to remember when are you flirting with someone